

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION**

SHAVONNE GEDDIS-WRIGHT,
Individually and on behalf of all others
similarly situated,

Plaintiff,

V.

AMERICAN HONDA MOTOR
COMPANY, INC.

Defendant.

Case No.: 5:24-cv-04886-MGL

**DEFENDANT AMERICAN HONDA
MOTOR COMPANY, INC.'S
ANSWERS TO LOCAL RULE
26.01 INTERROGATORIES**

COMES NOW Defendant American Honda Motor Company, Inc. (“Honda”) and responds to the Local Rule 26.01 Interrogatories as follows:

- (A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: At this time, Defendant American Honda Motor Company, Inc. is not aware of any persons or legal entities who may have a subrogation interest in any of the claims at issue.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff has demanded a jury trial in this matter on all claims.

- (C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: American Honda Motor Company, Inc. is not publicly held. American Honda Motor Company, Inc. is a wholly owned subsidiary of Honda Motor Co., Ltd., a Japanese corporation. Honda Motor Co., Ltd. (NYSE: HMC) is a publicly held

corporation. No publicly held corporation owns ten percent (10%) or more of the stock of Honda Motor Co., Ltd.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

ANSWER: Plaintiff filed this lawsuit in this division on the basis that Honda sells and markets the vehicles at issue in this division.

- (E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical 24 transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Honda is not aware of any related matters in this District.

- (F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable.

- (G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER: Not applicable.

- (H) Parties or Intervenor in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

ANSWER: Not applicable, this case was brought as a federal question case under the Class Action Fairness Act.

Dated this the 10th day of December, 2024.

SHOOK, HARDY & BACON LLP

/s/ Caroline M. Gieser

Caroline M. Gieser
SC Fed. ID # 12627
cgieser@shb.com
1230 Peachtree St., Suite 1200
Atlanta, GA 30309
Tel: (470) 867-6013
Fax: (470) 867-6001

***Counsel for Defendant American Honda Motor
Company, Inc.***

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2024, a copy of **DEFENDANT AMERICAN HONDA MOTOR COMPANY, INC.'S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES**, was filed electronically with the clerk of court via CM/ECF, which will then send a notification of such filing to all counsel of record.

Paul J. Doolittle
POULIN WILLEY ANASTOPOULO
32 Ann Street
Charleston, SC 29403
paul.doolittle@poulinwilley.com
cmad@poulinwilley.com

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cgieser@shb.com
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Counsel for Defendant American Honda Motor Company, Inc.